



Land Disposal Restriction  
Notification Form

Page : 1 of 2

Printed Date : Jun 24, 2013

MANIFEST INFORMATION

Generator : Norquay Technology Inc

Address: 800 West Front Street  
Chester, PA 19013

EPA ID #: PAD982363889

Manifest Tracking Info.

006615113FLE

Sales Order No: 737312035

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
		CH209133	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

F003

F005

EPA Waste SubCategory

High TOC Ignitable Liquids

Carbon Disulfide, Cyclohexanone, and/or methanol  
mixtures only

Carbon Disulfide, Cyclohexanone, and/or methanol  
mixtures only

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
ACETONE	Y	Y	N
METHANOL	Y	Y	N
TOLUENE	Y	Y	N

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
2.	1	CH419477	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

F003

F005

EPA Waste SubCategory

Carbon Disulfide, Cyclohexanone, and/or methanol  
mixtures only

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ACETONE	Y	Y	N
METHANOL	Y	Y	N
TOLUENE	Y	Y	N





**COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

### INSPECTION REPORT COMMENTS

**Date of inspection** 1-14-2010 **Identification Number** PAD982363889

**Company/Facility/Site Name** Norquay Technology Incorporated

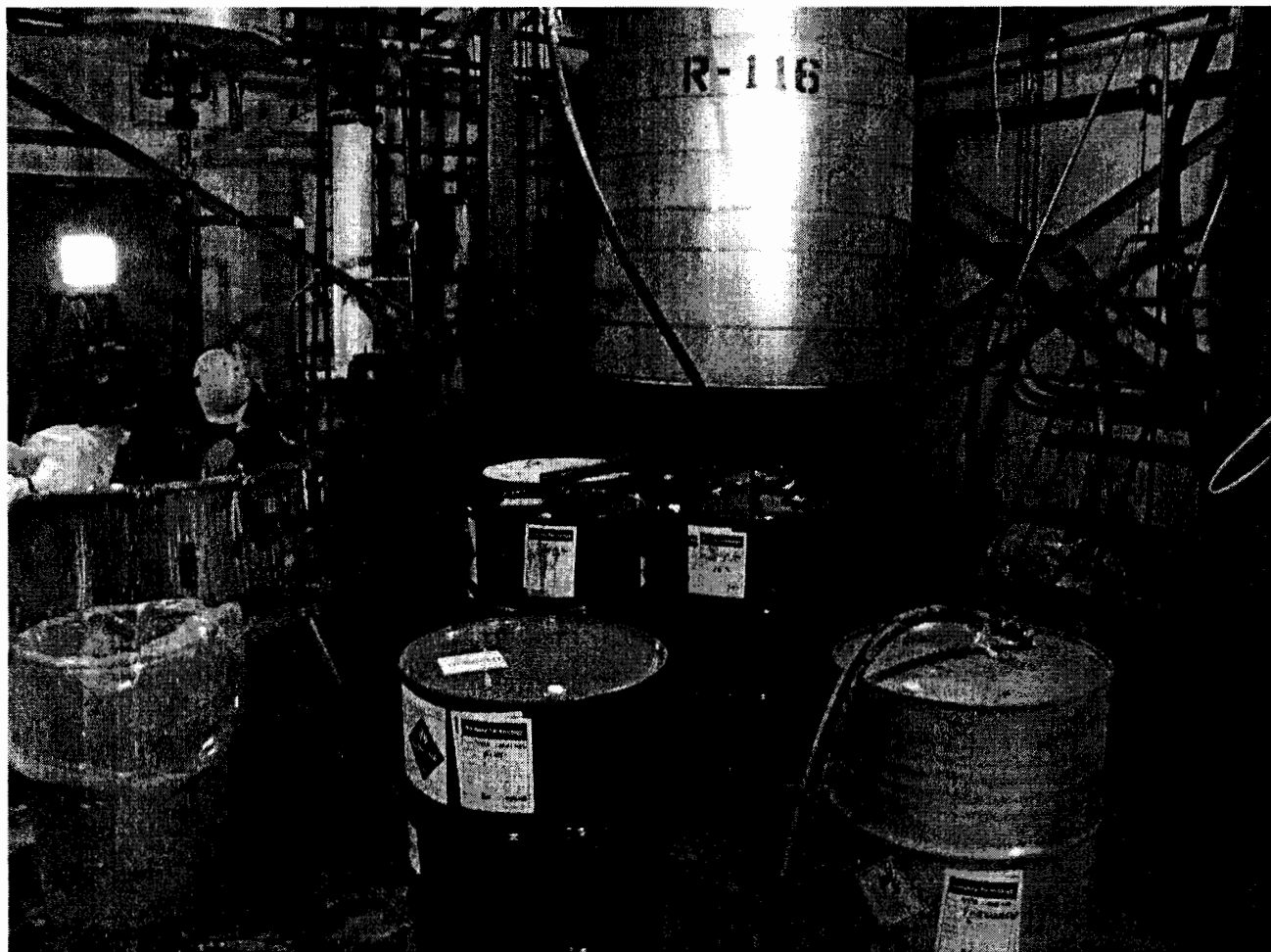


Image 1: This image displays drums containing solvents that are in the process of being either reacted or distilled within the Reactor Room on January 14, 2010.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Inspector (signature) \_\_\_\_\_ Date \_\_\_\_\_

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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

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Date of inspection 1- 14 - 2010 Identification Number PAD982363889

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Image 2: This image displays waste observed within a residual waste drum inside the reactor room on January 14, 2010.

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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 3-25-2010 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Incorporated

On March 25, 2010, Mr. Jonathan Bower, Compliance Specialist with the Department, and I (Jonathan Lorio) conducted a follow up large quantity hazardous waste generator inspection of Norquay Technology Incorporated, located at 800 Front Street Chester, PA 19016 in Chester, Delaware County. Mr. Alex Mendez and Mr. Jim Kauer, Engineers, were present during the inspection. Norquay Technology, Inc is a batch specialty chemical manufacturer that produces organics and their intermediates thus generating organic and aqueous waste streams.

The warehouse hazardous waste storage area was observed. All drums were properly labeled with the words "hazardous waste", and the identity of the contents within the drum. All drums were properly lidded and labeled with accumulation start dates within 90 days of the date of this inspection. All drums were placed within portable secondary containment pallets, and appeared in adequate condition.

The facility's Reactor Room was observed. All hazardous waste drums stored within the Reactor Room were labeled as "hazardous waste" and the identity of the contents within the drum. All waste drums were labeled with accumulation start dates within the past 90 days, and the drums were placed upon portable containment pallets.

During the January 14, 2010 inspection, a waste drum containing dirty gloves, paper towels, and other solid wastes was observed within the reactor room. Since there was a possibility that the solids observed within the drum were in contact with ignitable solvents or other ignitable materials, Norquay has chosen to managed the waste as a hazardous solid waste. During the inspection, the waste container holding the hazardous solid waste was properly labeled and lidded.

On February 1, 2010, Norquay started a log to inventory the amount of spent solvents being stored on site. No solvents were processed since February 2010. Norquay intends to include the amounts of solvent processed within this log.

**- No Violations Observed**

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Person interviewed (signature) Copy Mailed To Facility Date 3-26-10  
Inspector (signature) [Signature] Date 3-26-10



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DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 1-14-2010 Identification Number PAD982363889Company/Facility/Site Name Norquay Technology Incorporated

On January 14, 2010, I (Jonathan Lorio) conducted a follow up large quantity hazardous waste generator inspection of Norquay Technology Incorporated, located at 800 Front Street Chester, PA 19016 in Chester, Delaware County. Mr. Alex Mendez and Mr. Jim Kauer, Engineers, were present during the inspection. Norquay Technology, Inc is a batch specialty chemical manufacturer that produces organics and their intermediates thus generating organic and aqueous waste streams.

Norquay Technology's two satellite accumulation areas were observed. A drum of flammable solvent waste near the vacuum room was properly lidded, labeled, and had a containment pallet beneath it. Within the facilities research and development lab, one container of flammable hazardous waste was observed to be properly labeled and lidded. A small containment pan was observed underneath the waste container.

The warehouse hazardous waste storage area was observed. There were six drums of hazardous waste stored near the northeast corner of the warehouse. These drums contained flammable liquids waste. The six drums were properly labeled with the words "hazardous waste", and the identity of the contents within the drum. This *corrects the violation to the Solid Waste Management Act of Pennsylvania 6018.403 (b)*. The six drums were properly lidded and labeled with accumulation start dates within 90 days of the date of this inspection. All drums were placed within portable secondary containment pallets, and appeared in adequate condition. This *corrects the violation to 40 CFR 265.171*.

The facility's Reactor Room was observed. Four hazardous waste drums containing flammable liquids were stored within the Reactor Room. Restrooms were being constructed in the facility's Utility Storage Room. This caused the four drums to be transferred from the Utility Room Storage Area into the Reactor Room, until the construction is completed. All drums were labeled as "hazardous waste" and waste flammable liquids. All waste drums were labeled with accumulation start dates within the past 90 days, and the four drums were placed upon a portable containment pallet.

The distillation of in-process solvents occurs within the Reactor Room. Several other observations were observed within Norquay Technology's Reactor Room. Some solvent odors were encountered underneath the distillation tanks. Facility personnel are recommended to take actions to minimize the amount of solvent fumes escaping into the Reactor Room. Drums containing flammable solvents within the Reactor Room were labeled with flammable stickers, as displayed within Image 1. Image 2 displays a waste drum containing dirty gloves, paper towels, and other solid waste. Image 3 demonstrates that this drum was not identified as containing hazardous waste, and was not lidded during the inspection. Norquay personnel admitted that there was a possibility that the gloves observed within the waste drum, and displayed within Images 2 and 3, were in contact with ignitable solvents or other ignitable materials. **Within 14 days of the receipt of this report, Norquay Technology Inc. should submit**

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to the Department either a hazardous waste determination or a plan to complete a hazardous waste determination for the gloves, towels, and other solid wastes generated within the Reactor Room. Norquay personnel indicated that the gloves and towels observed within the waste drum are managed and disposed as a residual waste. The facility contacts were unsure of the exact disposal location for this waste stream during the inspection. **Within 14 days of the receipt of this report, Norquay Technology Inc. should indicate the disposal facility for their residual waste, and the facility that the glove and towel waste were sent to prior to this inspection.**

During the inspection, Norquay was unable to provide the Department documentation that the spent solvents on site were not speculatively accumulated. The facility is in the process of developing a log that will track the amount of solvents recycled through the distillation unit. This log would also tally the amount of recycled solvents that are used for their reactions. **Within 14 days of the receipt of this report, Norquay Technology Incorporated should submit to the Department documentation demonstrating that the spent solvents generated on-site are not speculatively accumulated.**

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Image 1: This image displays drums containing solvents that are in the process of being either reacted or distilled within the Reactor Room on January 14, 2010.

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Image 2: This image displays waste observed within a residual waste drum inside the reactor room on January 14, 2010.

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Image 3: This image displays the residual waste drum observed within the Reactor Room on January 14, 2010. The contents within this drum are displayed within Image 2.

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**Company/Facility/Site Name** Norquay Technology Incorporated



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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 09- 29 - 2009 Identification Number PAD982363889

Company/Facility/Site Name Norquay Technology Incorporated

On September 29, 2009, I (Jonathan Lorio) conducted a routine large quantity hazardous waste generator, large quantity residual waste generator, and residual waste permit by rule inspections of Norquay Technology Incorporated located at 800 Front Street Chester, PA 19016 in Chester City, Delaware County. Mr. Alex Mendez, Engineer, was present during the inspection. Norquay Technology, Inc is a batch specialty chemical manufacturer that produces organics and their intermediates thus generating organic and aqueous waste streams.

The outside property of Norquay Technology was observed during the inspection. Some issues were observed on the south side of the facility. Image 1 displays some processed wood, including pallets, scattered throughout the grounds outside of the facility. Some insulation was also observed on the ground outside the facility. Norquay Technology is recommended to remove the waste processed wood and waste insulation from the ground of their property. This would ensure compliance with The Solid Waste Management Act of Pennsylvania 6018.610 (1).

Norquay Technology's two satellite accumulation areas were observed. A drum of flammable solvent waste near the vacuum room was properly lidded, labeled, and had a containment pallet beneath it. Within the facilities research and development lab, one container of flammable hazardous waste was observed to be properly labeled and lidded. A small containment pan was observed underneath the waste container.

The warehouse hazardous waste storage area was observed. There were two drums of hazardous waste stored near the northeast corner of the warehouse. These drums contained flammable solids waste, and were properly labeled and lidded. The two drums contained accumulation dates within the past 90 days, and were placed underneath adequate secondary containment. Four additional waste drums were observed approximately 10 feet west of the electrical generator room, near the southwest side of the warehouse. Three of the drums did not contain labels. After a visual inspection of the contents within the drums, two were identified as containing solids from a trench, while the third drum contained plastics and floor sweepings. Norquay personnel stated that a hazardous waste determination was not completed upon these drums, **contrary to 40 CFR 262.11**. 25 PA Code 261a.3(a) requires that waste which has not been determined to be non-hazardous, be managed as hazardous until the determination is made. The three unlabeled drums were not labeled with the words "hazardous waste" and were not labeled to accurately identify the contents within them, **contrary to 40 CFR 262.34 (a) (3) and contrary to the Solid Waste Management Act of Pennsylvania 6018.403 (b)**, respectively. The three drums were not labeled with accumulation dates, **contrary to 40 CFR 262.34 (a) (2)**. One drum was labeled as containing hazardous flammable solids. The lid was not tightly attached to the container, **contrary to 40 CFR 262.34 (a) (1) (i) and 40 CFR 265.173 (a)**. The accumulation start date on that container was June 22, 2009, which is greater than 90 days from the date of this inspection. Storing waste for greater than 90 days without a permit is **contrary to 40 CFR 262.34 (a)**.

Four hazardous waste drums were observed within the Utility Room Storage Area, which was formerly identified as the Reactor Room. Three of the drums contained hazardous waste labels, while one drum was not labeled as hazardous waste, **contrary to 40 CFR 262.34 (a) (3)**. One drum was identified as waste flammable solids, while another drum was labeled as waste flammable liquids. These two drums had accumulation dates within 90 days of the date of the inspection. The other

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two drums were not labeled to accurately identify the contents within them, **contrary to the Solid Waste Management Act of Pennsylvania 6018.403 (b)**. The aforementioned drums did not have accumulation start dates labeled upon them, **contrary to 40 CFR 262.34 (a) (2)**. All four drums were placed upon a portable containment pallet.

The utility room contained a wastewater treatment tank. Some of Norquay's products undergo temperature control before being produced. Running these intermediates and products through cool environments generates a condensate, which drains into sumps and is later treated within the wastewater treatment tank. The pH of the wastewater is typically above 5 before being processed. After processing, the disposal facility requires the pH to be between 6 and 10. Norquay Technology was able to provide a daily record of the volumes of processed wastewater within their tanks. On days when the wastewater from the tanks is transported offsite for disposal, the log specifies the amount of waste that was withdrawn from the tanks. By calculating the difference between the volume of waste within the tanks on two consecutive days, and accounting for the waste sent off site, Norquay Technology was able to provide a volume for the amount of wastewater processed during that day. The daily records of processed wastewater were reviewed from January 2009 through the date of this inspection.

Processed wastewater is stored within a new residual wastewater tank system, recently installed at the facility. Wastewater automatically enters a 5000 gallon residual wastewater tank (R1) that has an electronic gauge and high level alarm. Valves connect R1 to two additional 5000 gallon wastewater tanks (R2, R3). R2 and R3 are used to remove wastewater from R1 and allow additional storage for wastewater prior to disposal. A fourth residual waste tank (R4) has a capacity of 2500 gallons. This tank also connects to R1. The valve to this tank is locked and Norquay employees must ask Mr. Mendez for the key, and permission, to discharge into R4. All four residual waste tanks are surrounded by a secondary containment pad.

Norquay Technology has received estimates from companies concerning high level alarms for tanks R2, R3, and R4. At the time of the inspection, Norquay Technologies did not have a high-level alarm or a documented manned operator shutdown procedure, which is **contrary to 25 PA Code 299.122 (b) (7) (ii)**.

Norquay Technology generates spent solvents, such as toluene, acetone, and hexane, through their chemical manufacturing operations. The spent solvents are placed within drums and accumulated on site within the warehouse. Once Norquay generates enough spent solvents, they distill the fluids within their reactor. Clean solvent and a flammable solid hazardous waste are generated from the distillation. The spent solvents are stored within 55 gallon drums. Image 2 displays a 55 gallon drum of accumulated spent solvent. This drum was not labeled with the words "hazardous waste", **contrary to 40 CFR 262.34 (a) (3)**. The drum was labeled with the accurate identity of its contents, and had an accumulation start date. The drum was on top of a wooden pallet which does not qualify as secondary containment. The failure to place a drum containing a liquid hazardous waste within secondary containment is **contrary to 25 PA Code 265a.179 and 40 CFR 264.175**. Drums containing the spent solvent prior to distillation cannot be stored for longer than 90 days. Mr. Mendez estimated that more than 100 drums containing spent solvent may be stored at the facility.

Norquay Technology's wastewater manifests will be reviewed during an upcoming inspection. The facilities hazardous waste has been most recently transported by Maumee Express (PA-AH 0420) to Ecoflo, Inc. (NCD980842132) of

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Greensboro, NC. Manifests 005686933 JJK from August 18, 2009, and 005686931 JJK from August 10, 2009, did not have return copies with the signature of the designated facility. These manifests were faxed to Norquay Technologies and reviewed by the assigned before the inspection terminated. Manifests 005686931 JJK from August 10, 2009, 005686932 JJK from August 12, 2009, 005686933 JJK from August 18, 2009, 005686934 JJK from August 25, 2009, 005686854 JJK from September 10, 2009, and 005686644 JJK from September 22, 2009 had MXI Environmental Services LLC (VAR000503920) as their transporter of hazardous waste. MXI Environmental Services does not have valid hazardous waste transporter license issued by the Department. The generator's failure to offer shipment of hazardous waste only to a transporter with a valid license issued by the Department is **contrary to 25 PA Code 262a.12 (b) (2) and The Solid Waste Management Act of Pennsylvania 6018.401 (a)**.

The last hazardous waste training for Norquay Technology employees was preformed by IES Engineers on October 28, 2008. Weekly Hazardous Inspection Logs for the Reactor Room, R&D Lab, Vacuum Room, and Warehouse since July 2009 were reviewed. Norquay is recommended to inspect the entire warehouse during their weekly inspections to identify unlabeled hazardous waste drums. The facility's 2007 hazardous waste biennial report was reviewed during a prior inspection. The facility's 2008 residual waste biennial report was briefly reviewed. The facility's source reduction strategies (25R) were reviewed and were recently updated in August of 2009. Norquay Technology's 2008 Chemical Analyses of Waste (26Rs) for their wastewater and plant trash streams were briefly reviewed. There were no 26Rs completed for the "Solids from Trench" and "Floor Sweepings Waste" identified within the warehouse.

- **Thirteen (13) Violations Observed.**

**Within fourteen (14) days of the receipt of this report, Norquay Technology Inc. should submit to the Department a schedule and plan detailing what actions the facility intends to take to correct and prevent the thirteen violations noted.**

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Image 1: This image displays solid waste observed scattered along the southern side of Norquay's property on September 29, 2009.

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Image 2: This image display a drum containing spent solvent prior to undergoing distillation, observed on top of a wood pallet within the warehouse on September 29, 2009.

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Department of Environmental Protection		GENERAL INSPECTION REPORT		Bureau of Land Recycling and Waste Management	
Type of Inspection	WM Identification Number	Entry Time/Date		Exit Time/Date	
<b>Follow-Up Inspection</b>	<b>PAD982363889</b>	<b>Thurs 5/18; 11am</b>		<b>5/18; 12pm</b>	
Facility/Incident Name and Location				Municipality	
<b>Norquay Technology, Inc.</b>				<b>Chester City</b>	
<b>PO BOX 468, Chester, PA 19016-0468</b>				County	
				<b>Delaware</b>	
Name, Address of Responsible Official			Title		
<b>Bob Heldt</b>			<b>President</b>		
			Telephone		Interviewed
			<b>610-874-4330</b>		Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

On the morning of Thursday, May 18<sup>th</sup> 2012, a follow-up waste management inspection was conducted at Norquay Technology by Department personnel Betsie Phillips and I (James Horan). We were greeted at the facility by Project Engineer Mr. James Hogate, who granted us access and accompanied us on a tour. This visit is in continuance to an inspection conducted on Thursday, April 5<sup>th</sup>.

Upon viewing the main drum storage area, it was noted that all drums onsite were properly labeled, sealed, and in good condition. They were also dated and properly arranged in a readily-accessible manner. Drums containing waste were stored in a separate, dedicated, and clearly-identified area of the warehouse. Although the entire warehouse floor is considered a sealed containment basin, many drums were stored atop secondary-containment pallets. These revised conditions are in accordance with the regulations set forth in 40 CFR 264 - Subpart I, and therefore resolve most of the violations noted in the April 5<sup>th</sup> inspection report.

A violation of Subpart I that remains unresolved is the completion and documentation of weekly inspections of the waste storage area. A simple log should be kept indicating that all drums are closed, labeled, dated, and in good condition, with no leaks or immanent hazards present. This will ensure compliance with 40 CFR 264.174. Also, a source reduction strategy (Form 25R) should be completed and kept on-file for both hazardous and residual waste streams. These documents should be updated every 5 years, or whenever necessary. Further details on this can be found in PA Code 262a.100.

All previous violations are hereby closed out. A follow-up inspection will not be necessary.

Inspector Name	Inspector Signature	Headquarters SERO 2 East Main Street	Date
		Norristown, PA 19401	Telephone
Person Interviewed Name	Signature of Person Interviewed	Title	Telephone

*This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.*

*This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.*

*Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.*



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4/5/2012Inspection ID# 2059577

## HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name Norquay Technology, Inc. I.D. Number PAD982363889Site Address PO BOX 468, Chester, PACounty Delaware Municipality Chester City Zip 19016-0468Name of Inspector James HoranName & Title of Responsible Official Bob Heldt, PresidentPerson Interviewed Jim Hogate, Project Engineer Telephone ( 610 ) 874-4330

Mailing Address (if different from above) \_\_\_\_\_

Amount of Hazardous Waste Generated per Month: >1000 kgHW PF: **446494** SF: **316051**

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent Bulbs & Ballasts, etc.

## 3. Hazardous Waste Transporters:

Transporter Name ECOFLO, Inc. License Number PA-AH 0225Transporter Name Clean Harbors, Inc. License Number PA-AH 0312Transporter Name Maumee Express, Inc. License Number PA-AH 0420

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
D001	Ignitables	See 2011 HW Biennial Report
D002	Corrosives	^
D003	Reactives	^
D028	1,2-Dichloroethane	^
F003, F005	Spent Solvents, Tank Bottoms	^
U080	Methylene chloride	^
U112	Ethyl acetate	^

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Norquay Technology ID Number PAD982363889 Date 4/5/2012

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name Norquay Technology ID Number PAD982363889 Date 4/5/2012

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<b>CONTAINERS</b> (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179	264.175	H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Norquay Technology ID Number PAD982363889 Date 4/5/2012

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				<b>LQG TANKS (Subchapter J)</b>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled to accurately identify contents	265a.194		H044
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections completed and documented in operating log	265a.195	265.195	H045
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special small quantity generator requirements	265a.1	265.201	H048
				<b>SQG TANKS</b>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All waste removed at closure	265a.1	265.201(d)	H056
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 4/5/2012

Identification Number PAD982363889

Company/Facility/Site Name Norquay Technology, Inc.

On the morning of Thursday April 5<sup>th</sup> 2012, I (James Horan) conducted a routine waste management inspection of Norquay Technology, located at 800 West Front Street in Chester, PA. Norquay is categorized as a large-quantity generator of hazardous and residual wastes, and is also considered to operate under a Permit-By-Rule for the processing of residual wastewater. I was greeted at the facility by Operations Controller Mr. Frank Bickert, President Bob Heldt, and Project Engineer Mr. James Hogate. PPE required for inspections at this facility include safety footwear, eyewear, and possibly a hard hat.

Norquay is a manufacturer of specialized chemicals in both standard and custom-synthesized varieties. As a result of these operations, the company generates multiple chemical and water-based waste streams which they containerize and ship offsite to designated disposal facilities. All listed transporters and destination facilities used by Norquay are authorized and licensed to handle such wastes.

After a comprehensive tour of the facility and its operations, Norquay is advised of the following:

- ✓ All drums on-site, whether containing products, intermediates, or wastes, should be clearly labeled to identify their contents.
- A clearly-identifiable, designated waste storage area should be used to store waste drums.
- All waste drums placed in storage should be dated on the day they are filled or sealed, and shipped off-site within 90 days.
- ✓ All operational drums should be in good condition, with no signs of corrosion or compromised integrity.
- ✓ The entire drum storage area should be visually inspected on a weekly basis, and a descriptive record should be kept of these inspections.
- A Source-Reduction Strategy for all waste streams should be kept on-file and available upon request.
- Norquay should ensure that all shipment manifests are followed through to completion, with signatures from the designated destination facility. If a valid final copy is unable to be obtained, an exception report should be filed with the Department within 45 days.

The facility's site safety plan (PPC equivalent) was reviewed, and appeared to be complete with all applicable contact numbers and emergency procedures included. Personnel training is conducted on an annual basis, and is provided by IES Engineers of Blue Bell, PA. The Annual Chemical Analysis (form 26R) of residual wastes was prepared by IES, and submitted to the Department on February 24<sup>th</sup> 2012, along with the 2011 hazardous waste biennial report. All drums observed were properly sealed, and no fugitive wastes or debris was observed inside or outside of the property. The containment floor appeared to be in good condition, with no apparent cracks or gaps in the structure. Satellite storage areas were in proper order, with containment pallets where necessary. Residual wastewater tanks (where pH adjustments are made prior to shipment) were properly labeled, contained, and equipped with high-level alarms. With the exception of missing signatures, no other manifest discrepancies were noted.

- **Several violations to be addressed.** A follow-up inspection may be conducted to monitor compliance.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning other violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  
Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) \_\_\_\_\_ Date \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

\* SEE FUI







COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 6/29/08

Time Start \_\_\_\_\_

Time Finish \_\_\_\_\_

## HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name NORQUAY TECHNOLOGY I.D. Number PAD982363889Site Address RIVERBRIDGE IND CTR, CHESTER, PACounty Delaware Municipality Trainer Borough Zip 19016Name of Inspector Paul JardelName & Title of Responsible Official Rick Ettenger - Facility EngineerPerson Interviewed SAA Telephone ( 610 ) 874-4330Mailing Address (if different from above) P.O. Box 468, Chester PA 19016-0468Amount of Hazardous Waste Generated per Month: >2200 Pounds \_\_\_\_\_ Kgs \_\_\_\_\_

## 1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other \_\_\_\_\_PBR: ☐ Neutralization/WWTP ☐ Reclaim Other \_\_\_\_\_GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Hg lamps, devices

## 3. Hazardous Waste Transporters:

Transporter Name Horwith Trucks License Number AH-0176

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

Transporter Name \_\_\_\_\_ License Number \_\_\_\_\_

## 4. Types of hazardous waste generated and destination facility (location &amp; type).

Waste Code	Waste Description	Destination Facility
D001, D038, F003-5	Solvents and solid wastes	EQ RR, Romulus MI

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name NORQUAY TECHNOLOGY ID Number PAD982363889 Date 6/29/05

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT**  
**GENERATORS -- SMALL QUANTITY GENERATORS**  
**FACILITY SPECIFICS**

Site Name NORQUAY TECHNOLOGY ID Number PAD982363889 Date 6/29/05

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				<b>CONTAINERS (Subchapter I)</b>			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name NORQUAY TECHNOLOGY ID Number PAD982363889 Date 6/29/05

1 - No Violation Observed      2 - Not Applicable      3 - Not Determined      4 - Non Compliance

### STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				<b>LQG TANKS (Subchapter J)</b>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled to accurately identify contents	265a.194		H044
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections completed and documented in operating log	265a.195	265.195	H045
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special small quantity generator requirements	265a.1	265.201	H048
				<b>SQG TANKS</b>			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All waste removed at closure	265a.1	265.201(d)	H056
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT  
GENERATORS -- SMALL QUANTITY GENERATORS  
FACILITY SPECIFICS**

Site Name NORQUAY TECHNOLOGY ID Number PAD982363889 Date 6/29/05

1 - No Violation Observed    2 - Not Applicable    3 - Not Determined    4 - Non Compliance

**STATUS**

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				<b>Containment Buildings</b> (Subchapter T)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Meets special requirements if liquids present	265a.1	265.1101(b)	H062
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				<b>Drip Pads</b> (Subchapter S)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reporting requirements met	265a.1	265.443(m)	H076
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

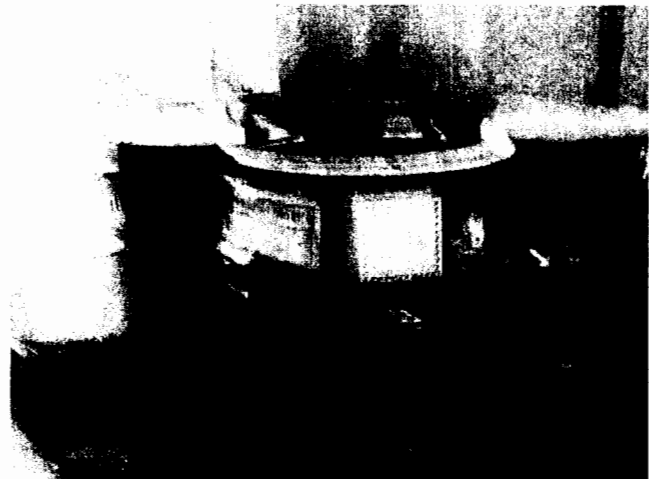
INSPECTION REPORT COMMENTS

Date of inspection 6/29/05 ID Number PAD982363889

Company/Facility/Site Name Norquay Technology Inc.



Warehouse 90 day storage area.



Reactor room secondary containment



Pump oil satellite accumulation area



Some of the many intermediate materials in storage

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Person interviewed (signature) Copy mailed to facility Date 6/29/05

Inspector (signature) \_\_\_\_\_ Date \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 6/29/05 ID Number PAD982363889

Company/Facility/Site Name Norquay Technology Inc.



Waste water collection tanks



Intermediate tank



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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 6/29/05 ID Number PAD982363889

Company/Facility/Site Name Norquay Technology Inc.

pH adjustment tank

**DEPT** WASTE MANAGEMENT DIVISION  
MICHIGAN DEPARTMENT OF  
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE  
ATT. ☐ DIS ☐ RES ☐ PR ☐

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator's Name and Mailing Address: Norquay Technology Inc.  
500 W. Fulton St.  
Ann Arbor, MI 48106

2. Generator's Phone: 734-769-4200

3. Transporter's Name: URS ERM

4. Transporter's Phone: 734-769-4200

5. Transporter's License No.: 0000000000000000

6. Transporter's EPA ID No.: 0000000000000000

7. Disposal Facility Name and Site Address: URS ERM  
500 W. Fulton St.  
Ann Arbor, MI 48106

8. Disposal Facility Phone: 734-769-4200

9. DOT Hazardous Material Label: 1111111111111111

10. DOT Hazardous Material Name: 1111111111111111

11. DOT Hazardous Material ID No.: 1111111111111111

12. Manifest Tracking No.: 1111111111111111

13. Manifest Tracking No. (Continued): 1111111111111111

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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 6/29/05 ID Number PAD982363889Company/Facility/Site Name Norquay Technology Inc.

This routine hazardous waste large quantity generator inspection of the above facility was done by Department Solid Waste Specialist Paul Jadel along with Mr. Rick Ettenger, Norquay facility engineer. During this inspection the following was observed:

**The satellite accumulation drum of hazardous waste vacuum pump oil was unidentified (262.34(c)). The drum was labeled during the inspection.**

The main hazardous waste storage area, located at the rear of the warehouse, near the loading dock, held 24 drums of liquid solvent waste and one drum of solid hazardous waste. All were properly labeled, closed and contained.

The reactor room portable secondary containment pallets held 4 drums of liquid solvent waste and one drum of solid hazardous waste. All containers were properly labeled and closed. Secondary containment records for both the main storage area and the reactor room were complete.

There was no universal waste elemental Mercury onsite during the inspection. Waste fluorescent lamps are segregated and placed into an appropriately labeled box.

Reviewed 2004 and 2005 manifests indicate that the facility is properly classified as a large quantity generator. All manifests were executed properly.

The facility Source Reduction Strategy is current and complete. Employee training is current but it the record is not clear on which employees manage hazardous wastes This requirement is found at 625.16(d).

The facility Emergency Response Plan (PPC Plan) is current. Section #6 (Regulatory Reporting) states that hazardous material releases in quantities exceeding the RQ should be reported. In addition it should be noted that **any** release in or outside of the plant that has the **potential** of reaching ground or surface water should be reported.

The facility process residual wastewater is collected in poly AST's, transferred to an intermediate tank and finally sent to another tank for pH correction prior to shipment offsite. All residual waste AST's should be labeled according to 299.122(a) and provided secondary containment (299.122(b)). It is possible that the facility will be subject to the residual waste permit by rule provisions of 287.102.

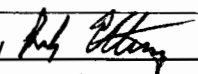
The facility is now developing designer polyethylene catalysis under the business name of Single Source Catalysts.

Nothing else was observed during this inspection.

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